

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DYNAMIC 3D GEOSOLUTIONS LLC,

Plaintiff,

v.

SCHLUMBERGER LIMITED
(SCHLUMBERGER N.V.);
SCHLUMBERGER HOLDINGS
CORPORATION; AND
SCHLUMBERGER TECHNOLOGY
CORPORATION,

Defendants.

CASE NO.: 1:14-CV-00112-LY

JURY TRIAL DEMANDED

**SCHLUMBERGER'S SUPPLEMENTAL SUBMISSION OF NEWLY PRODUCED
EVIDENCE IN SUPPORT OF DEFENDANTS' MOTION TO DISQUALIFY COUNSEL
AND TO DISMISS WITHOUT PREJUDICE**

Schlumberger files this Supplemental Submission of Newly Produced Evidence in Support of Defendants' Motion to Disqualify Counsel and to Dismiss Without Prejudice ("Motion to Disqualify"). ECF No. 48.¹

The supplemental evidence consists primarily of documents and privilege logs produced to Schlumberger near the eve of the hearing on Schlumberger's Motion to Disqualify. Schlumberger served ten separate sets of document requests on Dynamic 3D and related persons and entities. In response, the subpoenaed parties filed five separate motions to quash or for protection. The Honorable District Judge Keith Ellison and the Honorable Magistrate Judge Mark Lane largely overruled the objections and ordered most of the subpoenaed parties to produce documents and privilege logs by Friday, November 14. *See* Exs. 346 and 347 (transcripts of discovery hearings). Most of these documents were produced late Friday evening.

¹ Abbreviations defined in Defendants' Motion to Disqualify, ECF No 48.

After reviewing the newly produced evidence, pursuant to this Court's order (ECF No. 99), Schlumberger served its list of supplemental exhibits on Tuesday, November 18 (just prior to the Thursday, November 20 hearing). Schlumberger's list originally identified approximately 344 exhibits—the first 43 of which were already filed as exhibits to Defendants' briefing on the disqualification issue. Schlumberger ordered its supplemental exhibits by the party who produced the supplemental evidence, in bates-label order. *See* Ex. 348.

In light of the comments the Court made at the disqualification hearing, Schlumberger drastically pared down its supplemental evidence, reducing the new exhibits from 301 to 44. Schlumberger files only those exhibits that were referred to during the presentation at the disqualification hearing or that are essential to establish an appellate record.

At this stage of the proceedings, to facilitate the Court's review of the supplemental evidence, the documents are attached in chronological order. However, the exhibits maintain the same exhibit numbers referred to on Schlumberger's list of supplemental evidence (Ex. 348).

Dated: November 26, 2014

Respectfully submitted,

By: /s/ Paige Arnette Amstutz

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CERTIFICATE OF SERVICE

I hereby certify that, on November 26, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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